

interim deadlines may be extended by the parties on consent without application to the Court, provided that the parties meet the deadline for completing fact discovery set forth in paragraph 7 above.


- a. Initial requests for production of documents shall be served by November 2, 2018.
 - b. Interrogatories shall be served by March 5, 2019.
 - c. Depositions shall be completed by April 5, 2019.
 - d. Requests to Admit shall be served no later than March 5, 2019.
9. All expert discovery, including disclosures, reports, production of underlying documents, and depositions shall be completed by June 10, 2019. [The parties shall be prepared to describe their contemplated expert discovery at the bases for their proposed deadlines at the initial conference.]
 10. All discovery shall be completed no later than June 10, 2019.
 11. The Court will conduct a post-fact-discovery conference on April 5, 2019 at 4:15 p.m.. No later than one week in advance of the conference, the parties are to submit a joint letter updating the Court on the status of the case, including but not limited to whether either party intends to file a dispositive motion and what efforts the parties have made to settle the action.
 12. Unless otherwise ordered by the Court, the joint pretrial order and additional submissions required by Rule 6 of the Court's Individual Rules and Practices shall be due thirty (30) days from the close of discovery, or if any dispositive motion is filed, thirty (30) days from the Court's decision on such motion. The case shall be trial ready sixty (60) days from the close of discovery or the Court's decision on any dispositive motion.
 13. Counsel for the parties propose the following alternative dispute resolution mechanism for this case:
 - a. Referral to a Magistrate Judge for settlement discussions
 - b. X Referral to the Southern District's Mediation Program
 - c. Retention of a private mediator.

The use of any alternative dispute resolution mechanism does not stay or modify any date in this Order.

14. The parties have conferred and their present best estimate of the length of trial is 3-5 days.

SO ORDERED.

Dated: January 25, 2019
New York, New York



Hon. Ronnie Abrams
United States District Judge

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